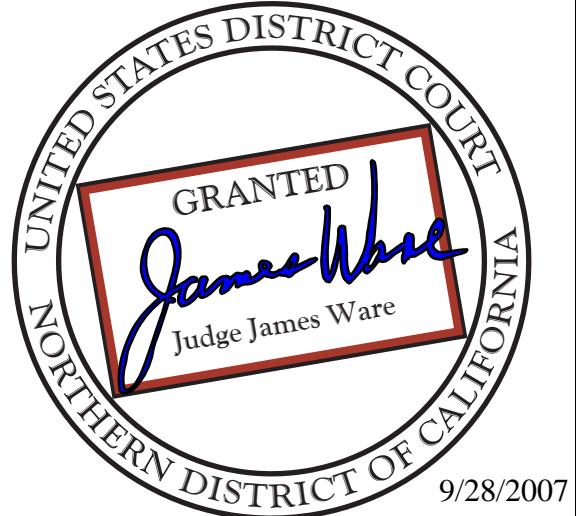


1 ANN MILLER RAVEL, County Counsel (S.B. #62139)
 2 GREGORY J. SEBASTINELLI, Deputy County Counsel (S.B. #104884)
 3 DAVID M. ROLLO, Deputy County Counsel (S.B. #111998)
 OFFICE OF THE COUNTY COUNSEL
 70 West Hedding, East Wing, 9th Floor
 San Jose, California 95110-1770
 Telephone: (408) 299-5900
 Facsimile: (408) 292-7240

5 Attorneys for Defendants
 6 County of Santa Clara and its Office of the
 Sheriff, Department of Correction, and Santa
 Clara Valley Health and Hospital System;
 7 Laurie Smith; Edward Flores; Toby Wong;
 Kim Roberts' Robert Sillen; Maryann Barry;
 Denise Becker; Christine Ferry; Beverly
 Purdy; Amarjit Grewal; Nancy Mager; and
 9 Herbie De La Cruz



10
 11
 12 UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 13
 14

15 ESTHER KRENN, on behalf of herself) No. C07-2295 JW
 16 and on behalf of her deceased son, LUIS)
 ANDREW MARTINEZ,)
 17 Plaintiffs,)
 18 v.)
 19 COUNTY OF SANTA CLARA et al.,)
 20 Defendants.)
 _____)

**STIPULATION AND (PROPOSED) ORDER
 ENLARGING RESPONSE TIME, AND
 MODIFYING ORDER SETTING INITIAL
 CASE MANAGEMENT CONFERENCE
 AND ADR DEADLINES**

[FED. CIVIL L.R. 6-1(B), 6-2, AND/OR 7-12]

22 The parties, through their respective counsel of record, hereby stipulate and agree to a
 23 later date for Defendants to respond to Plaintiffs' first amended complaint, and a modified Case
 24 Management Conference/ADR Scheduling Order, as follows:

25 Event	26 Current Date	27 Proposed Date
Complaint Filed	April 27, 2007	N/A
First Amended Complaint Filed	June 13, 2007	N/A

1	Event	Current Date	Proposed Date
2	Stipulation Extending Time For Defendants To File Responsive Pleading Filed	August 3, 2007	N/A
4	Waivers / Proofs of Service Filed	August 27, 2007	N/A
5	Defendants' Declination To Proceed Before U.S. Magistrate Judge Filed	September 5, 2007	N/A
7	Clerk's Notice of Impending Reassignment Issued	September 6, 2007	N/A
9	Reassignment Order Issued	September 6, 2007	N/A
10	Response to Complaint Due	September 19, 2007	October 19, 2007
11	Last Date to Meet and Confer Regarding Initial Disclosures, Early Settlement, ADR Process, and Discovery	September 24, 2007	October 18, 2007
14	Last Date to File Rule 26(f) Report, Initial Disclosures, and Joint Case Management Conference Statement	October 1, 2007	October 26, 2007
16	Initial Case Management Conference	October 15, 2007	November 19, 2007 at 10:00 a.m.

18 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
 19 "conformed" signature (/S/) within this e-filed document.

20 IT IS SO STIPULATED.

21 ANN MILLER RAVEL
 22 County Counsel

23 Dated: September 21, 2007

24 By: /S/
 25 GREGORY J. SEBASTINELLI
 Deputy County Counsel
 26
 27
 28 Attorneys for Defendants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
THE LAW OFFICES OF GERI LYNN
GREEN, LC

Dated: September 21, 2007

By: /S/
GERI LYNN GREEN

Attorney for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: September 28, 2007



95927.wpd

ANN MILLER RAVEL
County Counsel
County of Santa Clara
San Jose, California
Stipulation and (Proposed) Order Enlarging
Response Time, and Modifying Order Setting
Initial Case Management Conference ADR Deadlines